

REMARKS

Claims 1-2, 4-8, 10-14 and 16-18 were examined by the Office, and in the Office Action of October 15, 2010 all claims are rejected. With this response, no claims are amended, added or cancelled. Applicant respectfully requests reconsideration and withdrawal of the rejections in view of the following discussion.

**Claim Rejections Under § 112**

On page 2 of the Office Action, claims 1-2 and 4-6 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. The Office asserts that claims 1-2 and 4-6 recite elements that are means plus function limitations, and the written description fails to clearly link or associate the disclosed structure, material or acts to the claimed function. Applicant identifies the corresponding structure, material or acts from the written description as follows. Authentication means is supported by ROM discussed on page 8, lines 12-20, mode setting means is disclosed by the security control register discussed on page 9, lines 23-34, storage circuit access control means is disclosed by the security control register discussed on page 9, lines 18-23 and means arranged to indicate are disclosed by the terminal display and/or terminal loudspeaker discussed on page 10, lines 1-6. Accordingly, applicant respectfully requests withdrawal of the rejection to claims 1-2 and 4-6.

**Claim Rejections Under § 103**

On page 4 of the Office Action, claims 1-2, 4-8, 10-14 and 16-18 are rejected under 35 U.S.C. § 103(a) as unpatentable over Barrenscheen (U.S. Appl. Publ. No. 2002/0184523) in view of Helbig Sr. (U.S. Appl. Publ. No. 2002/0166062). Applicant respectfully submits that claim 1 is not disclosed or suggested by the cited references, because the cited references fail to disclose or suggest all of the limitations recited in claim 1. The cited references, alone or in combination, at least fail to disclose or suggest at least one storage area in a storage circuit in which protected data relating to security functions of the circuitry and protected applications are located, and storage circuit access control means arranged to enable a processor to access the storage area when a first processor operating mode is set, as recited in claim 1. For at least these reasons, claim 1 is not disclosed or suggested by the cited references.

In contrast to claim 1, Barrenscheen only discloses that the programmable unit transfers an application program to be carried out by the programmable unit or part of the application program, using a bootstrap loader from outside the programmable unit into an internal program memory in the programmable unit. See Barrenscheen paragraph [0016]. However, Barrenscheen does not disclose or suggest at least one storage area in a storage circuit in which protected data relating to security functions of the circuitry and protected applications are located, as recited in claim 1. Instead, Barrenscheen only states that the programmable unit transfers an application program, but provides no disclosure or suggestion that this application program is related to security functions of circuitry or is a protected application. Therefore, for at least this reason, claim 1 is not disclosed or suggested by the cited references.

Furthermore, Barrenscheen discloses five different operating modes for the programmable unit, and include a normal starting mode, a bootstrap loader start mode, an external start mode, an unconfigured start mode, and a test mode. See Barrenscheen paragraphs [0054]-[0059]. However, in none of these operating modes can a processor access a storage area in which protected applications are stored as in the first processor operating mode recited in claim 1. Instead, in the normal start mode it is impossible for a hacker to introduce commands into the programmable unit by which the memory to be protected can be read. See Barrenscheen paragraph [0065]. In the bootstrap loader start mode, commands that originate from outside the programmable unit can be executed, but the startup program sets the locking tag, which prevents data from being read from the flash memory. See Barrenscheen paragraph [0066]. In the external start mode, both the read protection and the write protection are active, so a hacker has no chance of reading or reprogramming the flash memory. See Barrenscheen paragraph [0067]. In the unconfigured start mode, the locking tag is set so a hacker has no chance to read or reprogram the flash memory. See Barrenscheen paragraph [0068]. In the test mode, the locking tag is set by the startup program so that a hacker has not chance to read or reprogram the flash memory in this operating mode. See Barrenscheen paragraph [0069]. Therefore, Barrenscheen fails to disclose or suggest an operating mode that corresponds to the first processor operating mode recited in claim 1 in which the processor is enabled to access the storage area. Accordingly, for at least this additional reason, claim 1 is not disclosed or suggested by the cited references.

Helbig Sr. fails to make up for the deficiencies in the teachings of Barrenscheen identified above, and therefore even the references in combination fail to disclose or suggest all of the limitations recited in claim 1.

Independent claims 7 and 13 include limitations similar to those recited in claim 1. Therefore, independent claims 7 and 13 are not disclosed or suggested by the cited references for at least the reasons discussed above with respect to claim 1.

The dependent claims rejected above, all ultimately depend from an independent claim, and therefore are not disclosed or suggested by the cited references at least in view of their dependencies.

#### Conclusion

It is respectfully submitted that the present application is in condition for allowance, and such action is earnestly solicited. The undersigned hereby authorizes the Commissioner to charge Deposit Account No. 23-0442 for any fee deficiency required to submit this response.

Respectfully submitted,

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Keith R. Obert  
Attorney for the Applicant  
Registration No. 58,051

WARE, FRESSOLA, VAN DER SLUYS  
& ADOLPHSON LLP  
755 Main Street, P.O. Box 224  
Monroe, Connecticut 06468  
Telephone: (203) 261-1234  
Facsimile: (203) 261-5676  
USPTO Customer No. 004955